




U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J.

Dated: August 5, 2024

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Riverkeeper, Inc. v. Regan*, No. 17 Civ. 4916 (VSB)

Dear Judge Broderick:

On behalf of defendants U.S. Environmental Protection Agency (“EPA”) and Michael Regan, in his official capacity as Administrator of the EPA (jointly, “defendants”), I write to respectfully request a one-week extension of the August 8, 2024 deadline for the parties to submit a joint status letter to the Court, and of the August 13, 2024 deadline for the current stay of the litigation. (ECF No. 204). Defendants respectfully request leave for the parties to file a joint status letter on **August 15, 2024**, and for the current stay of litigation to end on **August 20, 2024**. Plaintiffs and intervenor-defendants New York State Department of Environmental Conservation (“NYSDEC”) and the City of New York consent to this request.

Since the parties filed their last joint letter motion for a continuation of the joint status letter and stay deadlines on June 24, 2024 (ECF No. 203), all parties—including their attorneys and program staff—had a follow-up meeting on July 29, 2024, to discuss EPA’s and NYSDEC’s responses to the proposals in Plaintiffs’ June 20, 2024 letter, in furtherance of the parties’ continuing efforts to reach agreement on next steps in this matter. After that meeting, EPA and NYSDEC convened to further discuss certain questions and concerns raised by Plaintiffs during the July 29 meeting, and determined that additional time is needed for both agencies to engage in further internal and inter-agency discussions in order to respond to Plaintiffs’ concerns.

We thank the Court for its consideration of this request.

Hon. Vernon S. Broderick  
August 2, 2024

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Respectfully,

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cc (via ECF): All counsel of record